COMMONWEALTH OF MASSACHUSETTS Department of Telecommunications and Energy

RESPONSE OF THE ATTORNEY GENERAL TO THE SECOND SET OF INFORMATION REQUESTS FROM THE BAY STATE GAS COMPANY DTE 05-27

Dated: August 1, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-21 Refer to the Cavallo Testimony at page 6. Indicate by date, Company, location and description of activity undertaken, all other natural gas distribution system pipe excavations that Mr. Cavallo has witnessed throughout his career.

Response: Mr. Cavallo has not observed other "natural gas distribution system pipe excavations."

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